

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PETER E. DEUTSCH,

Plaintiff/Petitioner, and

RECEIVER ROBERT SEIDEN,

Plaintiff/Petitioner,

-against-

ZST DIGITAL NETWORKS, INC.,

Defendant/Respondent,

-and-

DUANE MORRIS LLP,

Garnishee.
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Case No. 13 CV 4571 (RPP)

REPLY DECLARATION
IN SUPPORT OF
MOTION TO DISMISS

Pursuant to 28 U.S.C. § 1746, J. Manly Parks, declares that the following facts are true and correct, subject to the laws against perjury of the United States of America:

1. I am a member of the firm Duane Morris LLP (Duane Morris”), attorneys pro se in this proceeding in which Duane Morris has been named as “Garnishee.” I submit this reply declaration in further support the motion of Duane Morris and defendant/respondent ZST Digital Networks, Inc. (“ZST”) for an order dismissing the Petition.

2. The sole purpose of this declaration is to put before the Court the additional documents referred to in the accompanying reply memorandum of law.

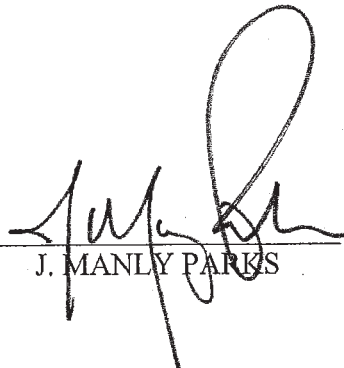
3. Annexed hereto as Exhibit E is a copy of an order dated May 15, 2013 which was issued by the Delaware Chancery Court in the matter entitled Peter E. Deutsch v. ZST Digital Networks, Inc. (the “Delaware Proceeding”). The order grants the Receiver’s initial application

for fees and expenses. Since this order was issued after May 14, 2013, when the Hong Kong firm of King & Wood Mallesons wired the advance fee retainer to Duane Morris, no order authorizing the Receiver to collect any fees had been made at the time of the wire transfer. Thus, even if the source of the funds King & Wood Mallesons wired to Duane Morris had been ZST (which was not the case), there would have been nothing improper about the transfer.

4. Annexed hereto as Exhibit F is a copy of a listing of all docket entries in the Delaware Proceeding. It shows that the order appointing the Receiver was entered on March 28, 2013 (Entry No. 66108226) and that the first order approving the Receiver's fees and expenses was not granted until May 15, 2013 (Entry No. 67239723).

5. It is respectfully submitted that the Petition does not state a plausible claim for relief and should therefore be dismissed.

Dated: Wilmington, DE
August 15, 2013



J. MANLY PARKS